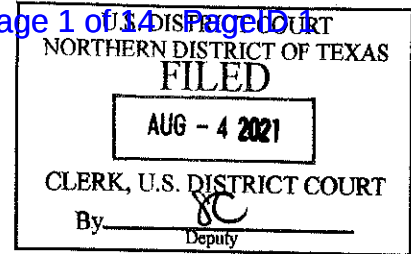


ORIGINAL



Wilfred L. Lee Jr.  
leewilfred2011@gmail.com  
91-1108 Kaimalie Street  
Ewa Beach, Hawaii 96706  
808-203-0881

Pro Se Plaintiff

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

PLAINTIFF'S COMPLAINT

Wilfred L. Lee Jr. )  
Plaintiff, )  
 )  
vs. )  
 )  
20/20 Communications, Inc. )  
aka 2020 Companies )  
Best Buy Co, Inc., )  
Samsung Electronics America, Inc., )  
Sara Wali )  
and Entity and Entities, Singular and )  
Pural, Known and Unknown, Past and )  
Present et.al )  
Defendant(s), )  
 )  
\_\_\_\_\_ )

CIVIL NO. **4-21CV-923 Y**

**EMPLOYMENT DISCRIMINATION  
COMPLAINT**

42 USC 2000e  
42 USC 1981  
Age Discrimination in Employment Act 1967  
Tex.Civ.Prac & Rem. Code 73.001

JURY TRIAL DEMAND

THE PARTIES TO THIS COMPLAINT

The Plaintiff(s)

Wilfred L. Lee Jr.  
91-1108 Kaimalie Street  
Ewa Beach, HI 96706  
808-203-0881  
leewilfred2011@gmail.com

The Defendant(s)

Defendant No.1  
20/20 Communications, Inc.  
aka 2020 Companies  
3575 Lone Star Circle #200  
Fort Worth, Texas 76177

Defendant No.2  
Sara Wali  
Field Operations Manager  
2020 Companies  
3575 Lone Star Circle #200  
Forth Worth, Texas 76177

Defendant No.3  
Best Buy Co., Inc.  
7601 Penn Avenue South  
Richfield, Minnesota 55423

Defendant No.4  
Samsung Electronics America, Inc.  
85 Challenger Road, Floor 7  
Ridgefield Park, New Jersey 07660

JURISDICTION

1. Jurisdiction is proper under 28 U.S.C 1331 and 28 U.S.C 1332

JURY TRIAL DEMAND

2. The Pro Se Plaintiff demands a trial by jury in all aspect of this matter.

PRO SE PLAINTIFF'S RIGHT TO AMEND THE COMPLAINT

3. Pro Se Plaintiff reserve the right to amend this complaint as more and additional information, evidence or defendant come to the knowledge of the Pro Se Plaintiff.

### STATEMENT OF FACTS

4. Upon information and belief the Defendants 2020 Companies, Sara Wali, Best Buy Co., Inc. and Samsung Electronics American, Inc., Co-manage the Samsung Experience in Best Buy Stores. This includes all hiring, termination of employees as Samsung Experience Consultant and/or Lead. The Defendants demonstrated Discriminatory Animus towards the Pro Se Plaintiff Wilfred L. Lee Jr. from their hiring process, failure to hire Pro Se Plaintiff due to their Race and Age.
5. The Pro Se Plaintiff Wilfred L. Lee Jr. is African American (Race) who is over 40 (Age).
6. Pro Se Plaintiff has been a resident of Hawaii for 11 years.
7. From 2011 through 2019 Pro Se Plaintiff Wilfred L. Lee Jr. is a career field marketer and brand evangelist with several years of experience employed by sales, marketing and brand advocacy companies, BDS Marketing, Market Source, Action Link.
8. From 2011 through 2019 working in Best Buy retail stores in Aiea, Honolulu, Hawaii and New York City, New York.
9. During Pro Se Plaintiff's career with the afro-mention brand advocacy companies performing the duties of demonstration, sales, evangelize products of client brands, Toshiba Computer, Canon Cameras and Printers, Hewlett Packard Computer and Printers, Dell Computer, Sony Cameras, and Intel. In Best Buy retail stores.
10. Pro Se Plaintiff has worked closely with Best Buy store associates and management building relationships, achieving project objectives and goals from 2011 through 2019. Also working in the same Best Buy stores as Samsung Experience Consultants. Becoming very knowledgeable about their job.
11. On or about October 29, 2019 Pro Se Plaintiff applied to 2020 Companies job post on indeed.com for Samsung Experience Consultant Lead as a full time position with the salary of \$21-24 dollars per hour at the Aiea, Hawaii Best Buy retail store.

12. Submitting their resume highlighting the afro-mention experience with brands and Best Buy associates.

13. The job requires the Samsung Experience Consultant Lead to demonstrate, sell, and evangelize Samsung products in the country's most well-known retailers (Best Buy). Ensure that consumers have the latest and most relevant product information at their fingertips when making a purchase decision. Be able to not only promote the Samsung brand to customers, but work closely with store associates and management to build tight-knit relationships.

14. From 2011 through 2019 the Pro Se Plaintiff had performed the requirements of this job for major brands and companies in the extract marketing and sales industry as Defendant 2020 Companies.

15. Pro Se Plaintiff understood that this job's location was the Aiea, Hawaii Best Buy retail store. They have worked in this store during their career and sought to continue their career at this location. Due to it's opportunities for high volume customers and sales.

16. On or about October 29, 2019 the Pro Se Plaintiff was scheduled for a phone screen interview with 2020 Companies recruiter Michel Pagliari.

17. During the phone screen interview Pro Se Plaintiff explained their experience and knowledge of performing the duties of the job and their history working in the Aiea, Hawaii Best Buy retail store.

18. When Pro Se Plaintiff asked about the salary the recruiter Michel Pagliari told them \$21-\$24 dollars per hour.

19. The recruiter Michel Pagliari scheduled the Pro Se Plaintiff for another interview with 2020 Companies Field Operations Manager Defendant Sara Wali on or about October 30, 2019.

20. On or about October 30, 2019 the Pro Se Plaintiff Wilfred L. Lee Jr. and Defendant Wali conducted a remote interview by video. With Pro Se Plaintiff appearing on video professionally dressed and explaining themselves confidently to the Defendant(s).

21. Upon belief Defendant Sara Wali did not show themselves on video during the interview and they seemed to be driving a automobile during the interview.

22. When interviewing with Defendant Sara Wali Pro Se Plaintiff again expressed their passion for sales, experience and knowledge of performing duties of the of job from 2011 through 2019 for other employers, their past working in the Aiea and Honolulu, Hawaii and New York City Best Buy's retail store and building relationships with store associates and management.
23. During the interview when Pro Se Plaintiff asked about the salary Defendant Sara Wali told them \$19-\$21 dollars per hour.
24. The Defendant(s) did not hire the Pro Se Plaintiff. On or about October 31, 2019 Pro Se Plaintiff was informed by recruiter Michel Pagliari that Defendant(s) had hired someone who looks for the position they are hiring for.
25. On November 2, 2019 the Pro Se Plaintiff discovered that the job post for Samsung Experience Consultant in Aiea, Hawaii was still active on indeed.com.
26. Plaintiff created a fictitious profile and applied for the position of Samsung Experience Consultant.
27. The Plaintiff created a fictitious profile to resemble a Caucasian (Race) under 40 (Age) named Ralph Wilson. Including a resume riddle with typo's and below basic experience in many areas for that position.
28. On or about November 4, 2019, the Defendant 2020 Companies, Defendant Sara Wali and 2020 Companies recruiter Michel Pagliari contacted the fictitious profile of Ralph Wilson by email to schedule a interview.
29. Upon information and belief Defendant Sara Wali showed their racial animus towards the Pro Se Plaintiff as a during hiring. Defendant Sara Wali made remarks to 2020 Recruiter Michel Pagliari on October 30, 2019 of their tone that Pro Se Plaintiff lacked demonstrated intelligence during their interview.
30. Upon information and belief dispute my employment qualifications for the Samsung Experience Consultant Lead. As a member of the protect class African American, over the age of 40, I applied and

was qualified, I was rejected for employment, the position remained open, other applicants where sought and the position was filled with someone not in my protected class and under 40 years of age.

31. Upon information and belief Defendant Sara Wali has shared their Off-color remarks about the Plaintiff's appearance and lack of intelligence due to their Race and Age. During the hiring process with Defendants 2020 Companies, Inc, Best Buy Co, Inc., Samsung Electronics America, Inc.

32. The Discriminatory Animus of Defendants 2020 Companies, Inc, Sara Wali, Best Buy Co., Inc. and Samsung Electronics American, Inc. Discriminatory hiring, failure to hire Pro Se Plaintiff Wilfred L. Lee Jr. due to their Race and Age. Has caused the Pro Se Plaintiff to suffer lack of income, mental anguish, mental distress, emotional trauma, psychiatric mayhem, the inability to seek and obtain gainful employment, loss of Professional reputation.

33. On or about November 14, 2019 I contacted the EEOC to file my complaint for employment discrimination (Race) African American and (Age) Over 40.

34. Upon information and belief my racial appearance (African American) and my age (Over 40). Are the reasons I was rejected for employment with the Defendants. Per the EEOC investigation.

35. Upon information and belief my employment experience and qualification were not the reason I was rejected for employment with the Defendants.

## **THE CLAIMS**

### **FIRST CLAIM FOR RELIEF**

42 U.S.C 2000e

36. The Pro Se Plaintiff alleges and re-alleges, repeats and reiterates with force from paragraph 1 to paragraph 35 and inclusive that the Defendant's 2020 Companies, Inc, Best Buy Co. Inc., Samsung Electronics American, Inc. Discriminatory hiring, failure to hire Plaintiff for the Samsung Experience Consultant Lead position because of appearance African American (Race) of the Plaintiff Wilfred L. Lee Jr.

37. Thus causing the Pro Se Plaintiff to suffer lack of income, mental anguish, mental distress, emotional trauma, psychiatric mayhem, the inability to seek and obtain gainful employment.

38. The Pro Se Plaintiff seeks damages in the amount of THREE HUNDRED THOUSAND DOLLARS for the afro-mention damages from each and every Defendant.

## SECOND CLAIM FOR RELIEF

42 U.S.C 1981

39. The Pro Se Plaintiff alleges and re-alleges, repeats and reiterates with force from paragraph 1 to paragraph 38 and inclusive that the Defendant's 2020 Companies, Inc, Sara Wali, Best Buy Co. Inc., Samsung Electronics American, Inc. Discriminated against Plaintiff to make and enforce contracts with the Defendants due to Pro Se Plaintiff's African American (Race).

40. Thus causing the Pro Se Plaintiff to suffer lack of income, mental anguish, mental distress, emotional trauma, psychiatric mayhem, the inability to seek and obtain gainful employment.

41. The Pro Se Plaintiff seeks damages in the amount of ONE MILLION DOLLARS for the afro-mention damages from each and every Defendant.

## THIRD CLAIM FOR RELIEF

The Age Discrimination in Employment Act of 1967

42. The Pro Se Plaintiff alleges and re-alleges, repeats and reiterates with force from paragraph 1 to paragraph 41 and inclusive that the Defendant's 2020 Companies, Inc, Best Buy Co. Inc., Samsung Electronics American, Inc. Discriminated during hiring, failure to hire Pro Se Plaintiff due to their over 40 (Age).

43. Thus causing the Pro Se Plaintiff to suffer lack of income, mental anguish, mental distress, emotional trauma, psychiatric mayhem, the inability to seek and obtain gainful employment.

44. The Pro Se Plaintiff seeks damages of back pay from date of employment application through this action, twenty years of front pay, liquid damages.

45. Amounts to be determined at jury trial for the afro-mention damages from each and every Defendant.

#### FOURTH CLAIM FOR RELIEF

TEX.CIV.PRAC & REM. CODE 73.001

46. The Pro Se Plaintiff alleges and re-alleges, repeats and reiterates with force from paragraph 1 to paragraph 45. Defendant Sara Wali, made Pre Se Libel statements to third parties for the purpose of intentional defamation of the Plaintiff's professional trade.

47. Thus causing the Pro Se Plaintiff to barred from consideration of future employment among 2020 Companies, Best Buy Co, Inc., Samsung Electronics America, Inc.

48. The Defendant's 2020 Companies, Best Buy Co, Inc., Samsung Electronics America, Inc., continued to made the same Pre Se Libel statements to third parties for the purpose of intentional defamation of the Plaintiff's professional trade.

49. The Pro Se Plaintiff suffers damage to their professional reputation, causing difficult securing employment, lack of income, mental anguish, mental distress, emotional trauma, psychiatric mayhem, loss of enjoyment in life, the inability to seek and obtain gainful employment.

50. The Pro Se Plaintiff seeks damages in amount of ONE MILLION DOLLARS for the afro-mention damages from each and every Defendant.

#### CONCLUSION

51. The Pro Se Plaintiff alleges, re alleges, repeats and reiterates with force from paragraph 1 to paragraph 50. The Pro Se Plaintiff filed a discrimination complaint with the United States Equal Employment Opportunity Commission timely and received a RIGHT TO SUE letter on May 26, 2021.

52. Must be presented to a jury for a decision in favor of the Pro Se Plaintiff in which the award of DAMAGES OF THE TOTAL SUM FROM WITHIN EACH CAUSE OF ACTION FROM EACH AND EVERY DEFENDANT, CORPORATE or PRIVATE.

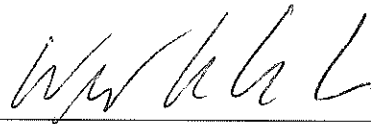


53. It must be concluded that EACH AND EVERY DEFENDANT, KNOWN and UNKNOWN, SINGULAR and PLURAL ENTITY and ENTITIES are in violation of, 42 USC 2000e; 42 U.S.C 1981; Age Discrimination in Employment Act 1967; Tex. CIV. Prac & Rem. Code 73.001.

54. In which upon to tally up all the sums of damage awards sort by the Pro Se Plaintiff in the amount of EIGHT MILLION NINE HUNDRED THOUSAND.

55. With Age Discrimination in Employment Act 1967 damages to be determined by a jury trial. Or calculated by the Pro Se Plaintiff upon entry of default and default judgement of this complaint by the Court.

State of Texas  
Date: August 2, 2021



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Signature of Pro Se Plaintiff

Wilfred L. Lee Jr

---

Pro Se Plaintiff's Name

## U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

**DISMISSAL AND NOTICE OF RIGHTS**

To: **Wilfred L. Lee, Jr.**  
**91-1108 Kaimalie Street**  
**Ewa Beach, HI 96706**

From: **Richmond Local Office**  
**400 North 8th Street**  
**Suite 350**  
**Richmond, VA 23219**

☐

On behalf of person(s) aggrieved whose identity is  
**CONFIDENTIAL (29 CFR §1601.7(a))**

EEOC Charge No.

EEOC Representative

Telephone No.

**450-2020-00671**

**Stephanie Hadden,**  
**Investigator**

**(804) 771-2163****THE EEOC IS CLOSING ITS FILE ON THIS CHARGE FOR THE FOLLOWING REASON:**
☐

The facts alleged in the charge fail to state a claim under any of the statutes enforced by the EEOC.

☐

Your allegations did not involve a disability as defined by the Americans With Disabilities Act.

☐

The Respondent employs less than the required number of employees or is not otherwise covered by the statutes.

☐

Your charge was not timely filed with EEOC; in other words, you waited too long after the date(s) of the alleged discrimination to file your charge

☒

The EEOC issues the following determination: The EEOC will not proceed further with its investigation, and makes no determination about whether further investigation would establish violations of the statute. This does not mean the claims have no merit. This determination does not certify that the respondent is in compliance with the statutes. The EEOC makes no finding as to the merits of any other issues that might be construed as having been raised by this charge.

☐

The EEOC has adopted the findings of the state or local fair employment practices agency that investigated this charge.

☐

Other (briefly state)

**- NOTICE OF SUIT RIGHTS -**

(See the additional information attached to this form.)

**Title VII, the Americans with Disabilities Act, the Genetic Information Nondiscrimination Act, or the Age Discrimination in Employment Act:** This will be the only notice of dismissal and of your right to sue that we will send you. You may file a lawsuit against the respondent(s) under federal law based on this charge in federal or state court. Your lawsuit must be filed **WITHIN 90 DAYS** of your receipt of this notice; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a claim under state law may be different.)

**Equal Pay Act (EPA):** EPA suits must be filed in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that **backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.**

 on

**May 26, 2021**

Enclosures(s)

**Daron L. Calhoun,**  
**Director**

(Date Issued)

cc:

**Janee Smith**  
**Legal Affairs Manager**  
**2020 Companies**  
**3575 Lone Star Circle #200**  
**Fort Worth, TX 76177**

**INFORMATION RELATED TO FILING SUIT  
UNDER THE LAWS ENFORCED BY THE EEOC**

*(This information relates to filing suit in Federal or State court under Federal law.  
If you also plan to sue claiming violations of State law, please be aware that time limits and other  
provisions of State law may be shorter or more limited than those described below.)*

**PRIVATE SUIT RIGHTS -- Title VII of the Civil Rights Act, the Americans with Disabilities Act (ADA),  
the Genetic Information Nondiscrimination Act (GINA), or the Age  
Discrimination in Employment Act (ADEA):**

In order to pursue this matter further, you must file a lawsuit against the respondent(s) named in the charge **within 90 days of the date you receive this Notice**. Therefore, you should **keep a record of this date**. Once this 90-day period is over, your right to sue based on the charge referred to in this Notice will be lost. If you intend to consult an attorney, you should do so promptly. Give your attorney a copy of this Notice, and its envelope or record of receipt, and tell him or her the date you received it. Furthermore, in order to avoid any question that you did not act in a timely manner, it is prudent that your suit be filed **within 90 days of the date this Notice was issued to you** (as indicated where the Notice is signed) or the date of the postmark or record of receipt, if later.

Your lawsuit may be filed in U.S. District Court or a State court of competent jurisdiction. (Usually, the appropriate State court is the general civil trial court.) Whether you file in Federal or State court is a matter for you to decide after talking to your attorney. Filing this Notice is not enough. You must file a "complaint" that contains a short statement of the facts of your case which shows that you are entitled to relief. Your suit may include any matter alleged in the charge or, to the extent permitted by court decisions, matters like or related to the matters alleged in the charge. Generally, suits are brought in the State where the alleged unlawful practice occurred, but in some cases can be brought where relevant employment records are kept, where the employment would have been, or where the respondent has its main office. If you have simple questions, you usually can get answers from the office of the clerk of the court where you are bringing suit, but do not expect that office to write your complaint or make legal strategy decisions for you.

**PRIVATE SUIT RIGHTS -- Equal Pay Act (EPA):**

EPA suits must be filed in court within 2 years (3 years for willful violations) of the alleged EPA underpayment: back pay due for violations that occurred **more than 2 years (3 years) before you file suit** may not be collectible. For example, if you were underpaid under the EPA for work performed from 7/1/08 to 12/1/08, you should file suit **before 7/1/10 -- not 12/1/10** -- in order to recover unpaid wages due for July 2008. This time limit for filing an EPA suit is separate from the 90-day filing period under Title VII, the ADA, GINA or the ADEA referred to above. Therefore, if you also plan to sue under Title VII, the ADA, GINA or the ADEA, in addition to suing on the EPA claim, suit must be filed within 90 days of this Notice and within the 2- or 3-year EPA back pay recovery period.

**ATTORNEY REPRESENTATION -- Title VII, the ADA or GINA:**

If you cannot afford or have been unable to obtain a lawyer to represent you, the U.S. District Court having jurisdiction in your case may, in limited circumstances, assist you in obtaining a lawyer. Requests for such assistance must be made to the U.S. District Court in the form and manner it requires (you should be prepared to explain in detail your efforts to retain an attorney). Requests should be made well before the end of the 90-day period mentioned above, because such requests do not relieve you of the requirement to bring suit within 90 days.

**ATTORNEY REFERRAL AND EEOC ASSISTANCE -- All Statutes:**

You may contact the EEOC representative shown on your Notice if you need help in finding a lawyer or if you have any questions about your legal rights, including advice on which U.S. District Court can hear your case. If you need to inspect or obtain a copy of information in EEOC's file on the charge, please request it promptly in writing and provide your charge number (as shown on your Notice). While EEOC destroys charge files after a certain time, all charge files are kept for at least 6 months after our last action on the case. Therefore, if you file suit and want to review the charge file, **please make your review request within 6 months of this Notice**. (Before filing suit, any request should be made within the next 90 days.)

***IF YOU FILE SUIT, PLEASE SEND A COPY OF YOUR COURT COMPLAINT TO THIS OFFICE.***

## CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

## I. (a) PLAINTIFFS

Lee Jr, Wilfred, L.

(b) County of Residence of First Listed Plaintiff Honolulu  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)  
91-1108 Kaimalie Street  
Ewa Beach, HI 96706

## DEFENDANTS

2020 Companies, Inc.; Best Buy Co, Inc.,  
Samsung Electronics America, Inc., Sara Wali, et.al

County of Residence of First Listed Defendant Fort Worth  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF  
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

## II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

## III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   | PTF                        | DEF                        |   | PTF                        | DEF                        |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State                   | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State                | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation  | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

## IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<b>PERSONAL INJURY</b> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input checked="" type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	<b>PRISONER PETITIONS</b> <b>Habeas Corpus:</b> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <b>Other:</b> <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

## V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from Another District (specify)
- ☐ 6 Multidistrict Litigation - Transfer
- ☐ 8 Multidistrict Litigation - Direct File

## VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):  
42 USC 2000e, 42 USC 1981, ADEA(1967)

Brief description of cause:  
Hiring Discrimination, Failure to Hire

## VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$  
8,900,000

CHECK YES only if demanded in complaint:  
JURY DEMAND: ☒ Yes ☐ No

## VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE 8/2/2021

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

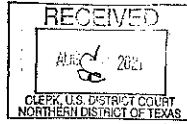
JUDGE

MAG. JUDGE

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UNITED STATES US

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SHIP TIME: 6:00 PM  
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FORT WORTH TX 76102

1817 960-8600



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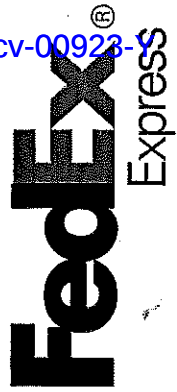
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Extremely Urgent

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